UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

COMPLAINT OF VIKING POWER, LLC, FOR EXONERATION FROM OR LIMITATION OF LIAIBLITY, CIVIL AND MARITIME.

C.A. No. 2021-cv-12081-NMG

NOTICE OF APPEARANCE OF FRANK CORP. ENVIRONMENTAL SERVICES PURSUANT TO RULE F OF THE SUPPLEMENTAL RULES FOR ADMIRALTY OR MARITIME CLAIMS AND ASSET FORFEITURE ACTIONS

NOW COMES Frank Corp. Environmental Services ("Frank Corp."), a Massachusetts corporation, and appears herein through the undersigned counsel, pursuant to Rule F of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions ("Rule F").

FRANK CORP. FURTHER PROVIDES NOTICE of its intent to, after receiving Notice pursuant to Rule F(4), bring forth an Answer, pursuant to Rule F(5), opposing any assertion by Complainant of a "right to limitation of liability" relative to the claims of Frank Corp.

FRANK CORP. FURTHER PROVIDES NOTEICE of its intent to object to, and requests to be heard concerning, any request by Complainant, pursuant to Rule F(3), to enjoin further prosecution by Frank Corp. of its claims against Complainant in Massachusetts Superior Court.

Respectfully submitted,

PLAINTIFF FRANK CORP.

ENVIRONMENTAL SERVICES,

By its attorney,

Jeffrey B. Renton, Esq. (BBO #554032)

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DATED: December 21, 2021

CERTIFICATE OF SERVICE

I, Jeffrey B. Renton, hereby certify that, on this 21st day of December 2021, I caused a true and correct copy of the foregoing document to be served on counsel of record for the Complainant electronically through the ECF system, and as a courtesy, by email:

Thomas Muzyka, Esq., and/or John Bromley, Esq., CLINTON & MUZYKA, P.C., Board of Trade Building, One India Street, Suite 200, Boston, MA 02109, tmuzyka@clinmuzyka.com, jbromley@clinmuzyka.com

Jeffrey B. Renton